

Mr. Terry Smith
Tenneco Packaging AVI
1411 Pidco Drive
Plymouth, Indiana 46563

Re: 099-12283-00028
First Minor Permit Modification to
Part 70 permit No.: T099-5969-00028

Dear Mr. Smith:

Tenneco Packaging AVI was issued a Part 70 permit T099-5969 on June 28, 1999 for a foam packaging material production. A letter requesting the addition of one (1) new oxidizer and the removal of two (2) existing oxidizers, was received on May 18, 2000. Pursuant to the provisions of 326 IAC 2-7-12 a minor permit modification to this permit is hereby approved as described in the attached Technical Support Document.

The modification consists of descriptive changes for the removal of two (2) existing recuperative thermal oxidizers designated as CE01 and CE02 and the installation of one (1) regenerative thermal oxidizer designated as CE04. The new regenerative thermal oxidizer shall require performance testing to demonstrate compliance with the BACT requirements listed under Condition D.1.2. In addition, the modification will correct a typographical error for the existing control device designated as CE03 from a recuperative thermal oxidizer to a regenerative thermal oxidizer.

All other conditions of the permit shall remain unchanged and in effect. Please attach a copy of this modification and the following revised permit pages to the front of the original permit.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Nysa L. James, OAM, 100 North Senate Avenue, P.O. Box 6015, Indianapolis, Indiana, 46206-6015, or call at (800) 451-6027, press 0 and ask for Nysa L. James or extension (3-6875), or dial (317) 233-6875.

Sincerely,

Paul Dubenetzky, Chief
Permits Branch
Office of Air Management

Attachments

NLJ

cc: File - Marshall County
U.S. EPA, Region V
Marshall County Health Department
Northern Regional Office
Air Compliance Section Inspector - Rick Reynolds
Compliance Data Section - Karen Nowak
Administrative and Development - Janet Mobley
Technical Support and Modeling - Michele Boner

PART 70 OPERATING PERMIT OFFICE OF AIR MANAGEMENT

**Tenneco Packaging AVI
1411 Pidco Drive
Plymouth, Indiana 46563**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T099-5969-00028	
Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Management	Issuance Date: June 28, 1999
First Administrative Amendment No.: 099-11469-00028	
Issued by: Paul Dubenetzky, Chief Permit Branch Office of Air Management	Issuance Date: November 4, 1999 Pages Affected: 29, 31, 36
First Minor Permit Modification No.: 099-12283-00028	
Issued by: Paul Dubenetzky, Chief Permit Branch Office of Air Management	Issuance Date: Pages Affected: 4, 29-32

SECTION A

SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

The Permittee owns and operates a stationary packaging materials manufacturing plant.

Responsible Official: Terry Smith
Source Address: 1411 Pidco Drive, Plymouth, Indiana 46563
Mailing Address: 1411 Pidco Drive, Plymouth, Indiana 46563
SIC Code: 3086
County Location: Marshall
County Status: Attainment for all criteria pollutants
Source Status: Part 70 Permit Program
Minor Source, under PSD Rules

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

This stationary packaging materials manufacturing plant consists of the following emission units and pollution control devices:

- (1) Three (3) profile extrusion lines, identified as PL-1, PL-2, and PL-4 respectively, using one (1) regenerative thermal oxidizer, identified as CE03, as control which exhausts to one (1) stack, identified as SC-3. Each profile extrusion line consists of the following equipment:
 - (a) One (1) extruder;
 - (b) One (1) foam profile die;
 - (c) One (1) curing chamber; and
 - (d) One (1) scrap line with an automated grinder and reclaim, identified as GR-8.
- (2) Two (2) enclosed foam sheet extrusion lines, identified as SL-1 and SL-2, respectively. Both foam sheet extrusion lines use one (1) regenerative thermal oxidizer, identified as CE04, as control which exhausts to one (1) stack identified as SC-4. Each foam sheet line consists of the following equipment.
 - (a) One (1) extruder;
 - (b) One (1) foam sheet die;
 - (c) One (1) curing chamber; and
 - (d) One (1) scrap line with an automated grinder and reclaim, identified as GR-1.
- (3) One (1) tandem profile extrusion line, identified as PL-3, using one (1) regenerative thermal oxidizer, identified as CE03, as control which exhausts to one (1) stack, identified as SC-3 and consists of the following equipment:

SECTION D.1

FACILITY OPERATION CONDITIONS

- (1) Three (3) profile extrusion lines, identified as PL-1, PL-2, and PL-4 respectively, using one (1) regenerative thermal oxidizer, identified as CE03, as control which exhausts to one (1) stack, identified as SC-3. Each profile extrusion line consists of the following equipment:
 - (a) One (1) extruder;
 - (b) One (1) foam profile die;
 - (c) One (1) curing chamber; and
 - (d) One (1) scrap line with an automated grinder and reclaim, identified as GR-8.
- (2) Two (2) enclosed foam sheet extrusion lines, identified as SL-1 and SL-2, respectively. Both foam sheet extrusion lines use one (1) regenerative thermal oxidizer, identified as CE04, as control which exhausts to one (1) stack identified as SC-4. Each foam sheet line consists of the following equipment.
 - (a) One (1) extruder;
 - (b) One (1) foam sheet die;
 - (c) One (1) curing chamber; and
 - (d) One (1) scrap line with an automated grinder and reclaim, identified as GR-1.
- (3) One (1) tandem profile extrusion line, identified as PL-3, using one (1) regenerative thermal oxidizer, identified as CE03, as control which exhausts to one (1) stack, identified as SC-3 and consists of the following equipment:
 - (a) One (1) extruder;
 - (b) One (1) foam profile die;
 - (c) One (1) curing chamber; and
 - (d) One (1) scrap line with an automated grinder and reclaim, identified as GR-8.
- (4) Two (2) 12,000 gallon blowing agent storage tanks, resulting in fugitive emissions.
- (5) Insignificant degreasing operation.

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.1.1 PSD Minor Source Status [326 IAC 2-2] [40 CFR 52.21]

- (a) The input of blowing agent for the entire source shall be limited to 3,500 tons per twelve (12) month period, rolled on a monthly basis. This input limitation shall result in equivalent VOC emissions of 249 tons per year, rolled on a monthly basis. The VOC potential to emit (PTE) for the entire source shall not exceed 249 tons per year. Therefore, the Prevention of Significant Deterioration (PSD) rules, 326 IAC 2-2 and 40 CFR 52.21, will not apply.
- (b) During the first twelve (12) months of operation, the input of VOC raw material usage shall be limited such that the total usage divided by the accumulated months of operation shall not exceed 291.6 tons per month.
- (c) Any change or modification which may increase the VOC PTE of this source to greater than 250 tons per year, shall require prior approval from IDEM, OAM before such change may occur.

D.1.2 General Reduction Requirements for New Facilities [326 IAC 8-1-6]

- (a) Pursuant to CP No. 099-9807-00028, issued on October 29, 1998, Best Available Control Technology (BACT) for the source has been determined to be the use of regenerative thermal oxidizers, CE03 and CE04. CE03 and CE04 must each have an overall control efficiency of 98% for the manufacturing process of the foam sheet and profile lines, and must each have an overall control efficiency of 95% for the scrap lines.
- (1) CE03 and CE04 shall each operate at all times to demonstrate compliance with the VOC limit of 249 tons per year, rolled on a monthly basis.
- (2) When operating, CE03 and CE04 shall each maintain a minimum operating temperature of 1500EF, or a minimum operating temperature as determined by the most recent compliance test, in order for each to maintain a 100% capture efficiency and a 98% destruction rate for the manufacturing process of the foam sheet and profile lines, and a 98% capture efficiency and a 97% destruction rate for the scrap lines.
- (b) Retention data tests, to determine the appropriate emission factors for the various grade types, shall be ran on all grades being utilized by the source. The source shall calculate the potential to emit (PTE) based on the worst case emission factors until the various emission factors for all other sheet grades have been verified and approved by OAM.

D.1.3 Particulate Matter (PM) [326 IAC 6-3-2(c)]

Pursuant to 326 IAC 6-3-2, the particulate matter (PM) overspray from SL-1, SL-2, PL-1, PL-2, PL-3, and PL-4 shall be limited by the following:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall not exceed the pound per hour emission rate established as E in the following formula:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour and} \\ P = \text{process weight rate in tons per hour}$$

D.1.4 Cold Cleaner Degreasing Operation [326 IAC 8-3-2]

The Permittee of the insignificant degreasing operation shall:

- (1) Equip the cleaner with a cover;
- (2) Equip the cleaner with a facility for draining cleaned parts;
- (3) Close the degreaser cover whenever parts are not being handled in the cleaner;
- (4) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;
- (5) Provide a permanent, conspicuous label summarizing the operating requirements;
- (6) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

D.1.5 Preventive Maintenance Plan [326 IAC 2-7-4(c)(9)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for SL-1, SL-2, PL-1, PL-2, PL-3, and PL-4 and any control devices.

Compliance Determination Requirements

D.1.6 Testing Requirements [326 IAC 2-7-6(1)]

- (a) Testing of this facility is specifically required by this permit. Compliance with the control efficiency and minimum operating temperature specified in Condition D.1.9 shall be determined by a performance test conducted in accordance with Section C Performance Testing.

Retention data tests shall also be determined by a performance test conducted in accordance with Section C Performance Testing.

- (b) During the period within sixty (60) days after the issuance of the first minor permit modification, a performance test on the regenerative thermal oxidizer designated as CE04, shall be required to demonstrate that the source is complying with 326 IAC 8-1-6.
- (1) If the oxidizer is determined to demonstrate compliance, the required temperature and control efficiency shall be specified.
 - (2) If the oxidizer is determined to not demonstrate compliance, the efficiency needed to comply with 326 IAC 8-1-6 shall be determined by the performance test.
 - (3) The source shall be required to comply with the required control efficiency as determined by the performance test.
- (c) Retention data tests, shall be ran on all grades being utilized by the source to verify the emission factors used in establishing the blowing agent and VOC emission limits. The source shall calculate the potential to emit (PTE) based on the worst case emission factors until the various emission factors for all other sheet grades have been verified and approved by OAM.

D.1.7 Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitations contained in Conditions D.1.1 and D.1.2 shall be determined pursuant to 326 IAC 8-1-4(a)(3)(A) using formulation data supplied by the coating manufacturer. IDEM, OAM, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

D.1.8 Particulate Matter (PM)

Pursuant to CP No. 099-9807-00028, issued on October 28, 1998, the dust collectors for PM control shall be in operation at all times when SL-1, SL-2, PL-1, PL-2, PL-3 and PL-4 are in operation.

D.1.9 Regenerative Thermal Oxidizer Operations

- (a) CE03 and CE04 shall each operate at all times SL-1, SL-2, PL-1, PL-2, PL-3, and PL-4 are in operation to demonstrate compliance with the VOC limit of 249 tons per year, rolled on a monthly basis.
- (b) When operating, CE03 and CE04 shall each maintain a minimum operating temperature of 1500°F, or a minimum operating temperature as determined by the most recent compliance test, in order for each to maintain a 100% capture efficiency and a 98% destruction rate for the manufacturing process of the foam sheet and profile lines, and a 98% capture efficiency and a 97% destruction rate for the scrap lines.

- (c) The owner or operator shall install, calibrate, operate and maintain a device that continuously records the combustion temperature of any effluent gases incinerated to achieve compliance with the limit in Condition D.1.2.
 - (1) This device shall have an accuracy of $\pm 2.5^{\circ}\text{C}$ or ± 0.75 percent of the temperature range measured in degrees Celsius, whichever is greater.
- (d) Any change or modification which may increase the VOC actual emissions to 250 tons per year or more shall require prior approval from IDEM, OAM before such change may occur.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.1.10 Record Keeping Requirements

- (a) To document compliance with Conditions D.1.1 and D.1.2 the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Conditions D.1.1 and D.1.2.
 - (1) The amount of VOC content by weight of the blowing agent in all stages of the processes (winder, warehouse finished goods and scrap recycling). Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Spreadsheet data shall be maintained to demonstrate how the VOC contents were determined;
 - (2) A log of the dates of use;
 - (3) The total blowing agent usage for each month; and
 - (4) Monthly emissions in pounds of VOC.
- (b) Continuous or intermittent readings of the minimum operating temperature shall be maintained to document compliance with Condition D.1.9.
- (c) Record of all malfunctions (any sudden unavoidable failure of the thermal oxidizers, CE03 and CE04) which result in violations of the Office of Air Management rules shall be kept for a period of three (3) years and made available to OAM upon request. When a malfunction resulting in a limit or parameter deviation occurs that lasts in excess of one (1) hour, notification of the condition shall be made to OAM no later than four (4) daytime business hours after the occurrence.
- (d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.11 Reporting Requirements

A quarterly summary of the information to document compliance with Conditions D.1.1 and D.1.2 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.

Indiana Department of Environmental Management Office of Air Management

Technical Support Document (TSD) for the First Minor Permit Modification to a Part 70 Operating Permit

Source Background and Description

Source Name:	Tenneco Packaging AVI
Source Location:	1141 Pidco Drive, Plymouth, IN 46563
County:	Marshall
SIC Code:	3086
Operation Permit No.:	T 099-5969-00028
Operation Permit Issuance Date:	June 28, 1999
First Minor Permit Modification No.:	T 099-12283-00028
Permit Reviewer:	Nysa L. James

The Office of Air Management (OAM) has reviewed a modification application from Tenneco Packaging AVI relating to the operation of a foam packaging plant.

History

On May 18, 2000, Tenneco Packaging AVI submitted an application to the OAM requesting to install one (1) regenerative thermal oxidizer designated as CE04, to remove two (2) existing recuperative thermal oxidizers designated as CE01 and CE02, and to correct a typographical error for the existing control device description designated as CE03 from a recuperative thermal oxidizer to a regenerative thermal oxidizer. Tenneco Packaging AVI was issued a Part 70 permit on June 28, 1999. On November 4, 1999, Tenneco Packaging AVI was issued their First Significant Source Modification (099-11161-00028) and their First Administrative Amendment (099-11469-00028) relating to a relaxation of the existing blowing agent usage limitation.

Existing Approvals

The source was issued a Part 70 Operating Permit (T099-5969-00028) on June 28, 1999. The source has since received the following:

- (a) First Administrative Amendment No.: 099-11469, issued on November 4, 1999; and
- (b) First Significant Source Modification No.: 099-11161, issued on November 4, 1999.

Changes Proposed

The Office of Air Management (OAM) has reviewed an application from Tenneco Packaging AVI, relating to the first minor permit modification to their Title V. This application was reviewed as a minor permit modification because the new regenerative thermal oxidizer does not cause an increase in the potential to emit of VOC and does not cause a significant change in the methods of demonstrating and monitoring compliance. In addition, this modification requires only descriptive changes to account for the new regenerative thermal oxidizer and the typographical correction. The changes are as follows (changes are bolded and stricken out for emphasis):

1. Section A.2, Emission Units and Pollution Control Equipment Summary listed on pages 4 and 5 of 37, is revised as follows to reflect the new regenerative thermal oxidizer and the removal of the two (2) existing recuperative thermal oxidizers (changes are bolded and stricken out for emphasis):

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)]
[326 IAC 2-7-5(15)]

This stationary packaging materials manufacturing plant consists of the following emission units and pollution control devices:

- (1) Three (3) profile extrusion lines, identified as PL-1, PL-2, and PL-4 respectively, using one (1) ~~recuperative~~ **regenerative** thermal oxidizer, identified as CE03, as control which exhausts to one (1) stack, identified as SC-3. Each profile extrusion line consists of the following equipment:
 - (a) One (1) extruder;
 - (b) One (1) foam profile die;
 - (c) One (1) curing chamber; and
 - (d) One (1) scrap line with an automated grinder and reclaim, identified as GR-8.
 - (2) Two (2) enclosed foam sheet extrusion lines, identified as SL-1 and SL-2, respectively. ~~Both The foam sheet extrusion lines identified as SL-1 and SL-2 uses one (1) recuperative~~ **regenerative** thermal oxidizer, identified as ~~CE02~~ **COE4**, as control which exhausts to one (1) stack identified as ~~SC-2~~ **SC-4**. ~~The foam sheet extrusion line identified as SL-2 uses one (1) recuperative thermal oxidizer, identified as SC-1.~~ Each foam sheet line consists of the following equipment.
 - (a) One (1) extruder;
 - (b) One (1) foam sheet die;
 - (c) One (1) curing chamber; and
 - (d) One (1) scrap line with an automated grinder and reclaim, identified as GR-1.
 - (3) One (1) tandem profile extrusion line, identified as PL-3, using one (1) ~~recuperative~~ **regenerative** thermal oxidizer, identified as CE03, as control which exhausts to one (1) stack, identified as SC-3 and consists of the following equipment:
 - (a) One (1) extruder;
 - (b) One (1) foam profile die;
 - (c) One (1) curing chamber; and
 - (d) One (1) scrap line with an automated grinder and reclaim, identified as GR-8.
 - (4) Two (2) 12,000 gallon blowing agent storage tanks, resulting in fugitive emissions.
2. Section D.1, Facility Descriptions listed on page 29 of 37, is revised to reflect the addition of the new regenerative thermal oxidizer and the removal of the two (2) existing recuperative thermal oxidizers (changes are bolded and stricken out for emphasis):
 - (1) Three (3) profile extrusion lines, identified as PL-1, PL-2, and PL-4 respectively, using one (1) ~~recuperative~~ **regenerative** thermal oxidizer, identified as CE03, as control which exhausts to one (1) stack, identified as SC-3. Each profile extrusion line consists of the following equipment:

- (a) One (1) extruder;
 - (b) One (1) foam profile die;
 - (c) One (1) curing chamber; and
 - (d) One (1) scrap line with an automated grinder and reclaim, identified as GR-8.
 - (2) Two (2) enclosed foam sheet extrusion lines, identified as SL-1 and SL-2, respectively. **Both** The foam sheet extrusion lines ~~identified as SL-4~~ uses one (1) ~~recuperative~~ **regenerative** thermal oxidizer, identified as ~~GE02~~ **COE4**, as control which exhausts to one (1) stack identified as ~~SC-2~~ **SC-4**. ~~The foam sheet extrusion line identified as SL-2 uses one (1) recuperative thermal oxidizer, identified as SC-1.~~ Each foam sheet line consists of the following equipment.
 - (a) One (1) extruder;
 - (b) One (1) foam sheet die;
 - (c) One (1) curing chamber; and
 - (d) One (1) scrap line with an automated grinder and reclaim, identified as GR-1.
 - (3) One (1) tandem profile extrusion line, identified as PL-3, using one (1) ~~recuperative~~ **regenerative** thermal oxidizer, identified as CE03, as control which exhausts to one (1) stack, identified as SC-3 and consists of the following equipment:
 - (a) One (1) extruder;
 - (b) One (1) foam profile die;
 - (c) One (1) curing chamber; and
 - (d) One (1) scrap line with an automated grinder and reclaim, identified as GR-8.
 - (4) Two (2) 12,000 gallon blowing agent storage tanks, resulting in fugitive emissions.
 - (5) Insignificant degreasing operation.
3. Condition D.1.2(a), General Reduction Requirements for New Facilities listed on page 30 of 37, is revised to reflect the addition of the new regenerative thermal oxidizer and the removal of the two (2) existing recuperative thermal oxidizers (changes are bolded and stricken out for emphasis):
- (a) Pursuant to CP No. 099-9807-00028, issued on October 29, 1998, Best Available Control Technology (BACT) for the source has been determined to be the use of ~~recuperative~~ **regenerative** thermal oxidizers, ~~GE01, GE02 and~~ CE03 **and CE04**. ~~GE01, GE02 and~~ CE03 **and CE04** must each have an overall control efficiency of 98% for the manufacturing process of the foam sheet and profile lines, and must each have an overall control efficiency of 95% for the scrap lines.
 - (1) ~~GE01, GE02 and~~ CE03 **and CE04** shall each operate at all times to demonstrate compliance with the VOC limit of 249 tons per year, rolled on a monthly basis.
 - (2) When operating, ~~GE01, GE02 and~~ CE03 **and CE04** shall each maintain a minimum operating temperature of 1500EF, or a minimum operating temperature as determined by the most recent compliance test, in order for each to maintain a 100% capture efficiency and a 98% destruction

rate for the manufacturing process of the foam sheet and profile lines, and a 98% capture efficiency and a 97% destruction rate for the scrap lines.

4. Condition D.1.6(b), Testing Requirements listed on page 31, of 37, is revised to reflect the addition of the new regenerative and to require testing of such new control device to ensure compliance with the BACT requirements listed under Condition D.1.2 (changes are bolded and stricken out for emphasis):
 - (b) During the period within **sixty (60)** days after the issuance of ~~this~~ **the first minor permit** modification, a performance test **on the regenerative thermal oxidizer designated as CE04**, shall be required to demonstrate that the source is complying with 326 IAC 8-1-6
 - (1) If the oxidizer is determined to demonstrate compliance, the required temperature and control efficiency shall be specified.
 - (2) If the oxidizer is determined to not demonstrate compliance, the efficiency needed to comply with 326 IAC 8-1-6 shall be determined by the performance test.
 - (3) The source shall be required to comply with the required control efficiency as determined by the performance test.
5. Condition D.1.9, Recuperative Thermal Oxidizer operations, is revised to reflect the addition of the new regenerative thermal oxidizer and the removal of the two (2) existing recuperative thermal oxidizers (changes are bolded and stricken out for emphasis):

D.1.9 ~~Recuperative~~ **Regenerative** Thermal Oxidizer Operations

- (a) ~~GE01, GE02 and CE03~~ **and CE04** shall each operate at all times SL-1, SL-2, PL-1, PL-2, PL-3, and PL-4 are in operation to demonstrate compliance with the VOC limit of 249 tons per year, rolled on a monthly basis.
 - (b) When operating, ~~GE01, GE02 and CE03~~ **and CE04** shall each maintain a minimum operating temperature of 1500EF, or a minimum operating temperature as determined by the most recent compliance test, in order for each to maintain a 100% capture efficiency and a 98% destruction rate for the manufacturing process of the foam sheet and profile lines, and a 98% capture efficiency and a 97% destruction rate for the scrap lines.
 - (c) The owner or operator shall install, calibrate, operate and maintain a device that continuously records the combustion temperature of any effluent gases incinerated to achieve compliance with the limit in Condition D.1.2.
 - (1) This device shall have an accuracy of $\pm 2.5^{\circ}\text{EC}$ or ± 0.75 percent of the temperature range measured in degrees Celsius, whichever is greater.
 - (d) Any change or modification which may increase the VOC actual emissions to 250 tons per year or more shall require prior approval from IDEM, OAM before such change may occur.
6. Condition D.1.10(c), Record Keeping Requirements listed on page 32 of 37, is revised to reflect the addition of the new regenerative thermal oxidizer and the

removal of the two (2) existing recuperative thermal oxidizers (changes are bolded and stricken out for emphasis):

- (c) Record of all malfunctions (any sudden unavoidable failure of the thermal oxidizers, ~~CE01, CE02 and~~ CE03 **and CE04**) which result in violations of the Office of Air Management rules shall be kept for a period of three (3) years and made available to OAM upon request. When a malfunction resulting in a limit or parameter deviation occurs that lasts in excess of one (1) hour, notification of the condition shall be made to OAM no later than four (4) daytime business hours after the occurrence.

Stack Summary

Stack ID	Operation	Height (feet)	Diameter (feet)	Flow Rate (acfm)	Temperature (°F)
S3	profile extrusion lines	40	3	20,000	350
S4	foam sheet extrusion lines	30	3	15,000	650

Recommendation

The staff recommends to the Commissioner that the First Minor Permit Modification be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An application for the purposes of this review was received on May 18, 2000, additional information was received on June 7, 2000.

Emission Calculations

There is no increase in production from this change, therefore there is not an increase in the potential to emit of VOC.

Potential To Emit

There is no change in the potential to emit for all criteria pollutants and HAPs from the First Significant Source Modification (099-11161) issued on November 4, 1999.

County Attainment Status

The source is located in Marshall County.

Pollutant	Status
PM-10	attainment
SO ₂	attainment
NO ₂	attainment
Ozone	attainment
CO	attainment
Lead	attainment

- (a) Volatile organic compounds (VOC) and oxides of nitrogen (NO_x) are precursors for the formation of ozone. Therefore, VOC and NO_x emissions are considered when

evaluating the rule applicability relating to the ozone standards. Marshall County has been designated as attainment or unclassifiable for ozone.

Federal Rule Applicability

There are no changes in Federal rule applicability from the original Title V.

State Rule Applicability - Entire Source

There are no changes in State rule applicability from the original Title V.

Compliance Requirements

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAM, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

The revised compliance determination requirements are listed above under the **Changes Proposed Section** as #4 and #5.

Conclusion

The operation of this foam packaging plant shall be subject to the conditions of the attached First Minor Permit Modification No. T 099-12283-00028.